

CC Docket 94-102

Enhanced 911 Tier III Interim Report

North Carolina RSA 3 Cellular Telephone Company

d/b/a Carolina West Wireless

September 1, 2005

North Carolina RSA 3 Cellular Telephone Company d/b/a Carolina West Wireless ("Carolina West Wireless") is a Tier III CMRS carrier that operates cellular radiotelephone service systems in North Carolina RSA 2(B) – Yancey and RSA 3(B) - Ashe. This report is submitted in accordance with the provisions of the Commission's Order in *Revision of Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems and E911 Phase II Compliance Deadlines for Tier III Carriers*, CC Docket 94-102, (released April 1, 2005).

Item 1: Number and Status of Phase I and Phase II Requests from Public Safety Answering Points (PSAPs)

All seven PSAPs located within Carolina West Wireless's service area have requested, have become capable of receiving and processing Phase I and Phase II E911 data, and are in fact receiving such data from Carolina West Wireless. All requests were fulfilled in a timely manner.

Item 2: Carrier's Specific Technology Choice

Carolina West Wireless has formally elected to deploy a handset-based solution for delivery of E911 Phase II services. The solution is operating on the CDMA network system which Carolina West Wireless installed during the second quarter of 2004.

Item 3: Status of Ordering and/or Installation of Necessary Network Equipment

Carolina West Wireless has completed installation and testing of equipment necessary to transmit Phase I and Phase II data to PSAPs. The services of TeleCommunications Systems, Inc. ("TCS"), with their proprietary Signal Soft location system, are utilized to coordinate with PSAPs, operate the location database and optimize E911 performance on Carolina West Wireless's CDMA network system, which utilizes a Nortel DMS-MTX switch.

Item 4: Date on Which Phase II Service Was/Will First Be Available in the Carrier's Network

Carolina West Wireless initially deployed Phase II services on June 18, 2004.

Item 5(a): Automatic Location Identity ("ALI")-Capable Handset Availability

Carolina West Wireless is currently selling E911 Phase II compliant handsets throughout its service area. Carolina West Wireless has experienced no particular difficulty obtaining ALI-capable handsets at reasonable prices.

Item 5(b): Information on Progress Towards Ensuring that Ninety-Five Percent of the Carrier's Subscriber Base Has Location-Capable Handsets.

All digital phones newly activated on Carolina West Wireless's network are ALI-capable, and have been since April, 2004, well before the FCC appointed date of November 30, 2004. Carolina West Wireless conducts a marketing campaign to encourage existing subscribers to trade in older handsets for ALI-capable handsets. Carolina West Wireless overtly advertises as a feature of the new phones their location assistance capabilities in the event of emergency. Direct mail campaigns and special offers are included in the enticement program.

While these efforts are expected to result in increasing the overall penetration rate of ALI-capable phones, Carolina West Wireless finds that some customers cannot be enticed to switch to CDMA ALI-capable handsets. Carolina West Wireless has an historically low rate of churn, and some customers prefer to use their legacy TDMA and high power analog phones, particularly in the remote and mountainous areas of Carolina West Wireless's territory. Other customers simply prefer not to learn and program new features on a new phone.

Given its best effort, Carolina West Wireless expects that by the end of 2005 the penetration rate of ALI-capable handsets on its network will not reach 95%. The company plans to request an extension of time to meet that threshold.